

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 23-11069 (CTG)  
)  
) (Jointly Administered)  
)  
) **Re: Docket No. 360**

**CERTIFICATION OF COUNSEL REGARDING MOTION OF DEBTORS TO  
APPROVE PROCEDURES FOR DE MINIMIS ASSET TRANSACTIONS AND  
ABANDONMENT OF DE MINIMIS ASSETS**

The undersigned hereby certifies that:

1. On August 29, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of Debtors to Approve Procedures for De Minimis Asset Transactions and Abandonment of De Minimis Assets* (the “Motion”) [Docket No. 360].

2. The deadline to respond to the Motion was on September 8, 2023 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

3. The Debtors received informal comments from (a) the Office of the United States Trustee, (b) Edinburgh Logistics and Finlayson Logistics, (c) Suburban Propone L.P., and (d) Excel Transportation Services Inc., and a filed objection from (e) Valley National Bank [Docket No. 433] (the “Responding Parties”).

4. The Debtors circulated a revised proposal form of order to the Responding Parties and the following parties: counsel to the Official Committee of Unsecured Creditors, the Junior DIP Lender, the B-2 Lenders, the ABL Agent, the United States Department of the Treasury, and

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

the UST Tranche A Agent and UST Tranche B Agent (collectively, with the Responding Parties, the “Reviewing Parties”).

5. Attached hereto as Exhibit A is a revised proposed form of order (the “Revised Proposed Order”) that has been circulated to the Reviewing Parties, which do not object to entry of the Revised Proposed Order. Attached hereto as Exhibit B is a redline of the Revised Proposed Order showing changes against the order filed with the Motion.

6. Accordingly, the Debtors respectfully request entry of the Revised Proposed Order at the Court’s earliest convenience.

Dated: September 14, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

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